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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

ROSS BYER, an individual,

Plaintiff,

vs.

CITY OF LA PALMA, a public
entity; and DOES 1 through
100, inclusive,

Defendants.

)
)
)
)
) No. 30-2024-01394359
) CU-OE-CJC
)
)
)
)
)

DEPOSITION OF ZACHARY GOBLE

APPEARING REMOTELY FROM

RIVERSIDE, CALIFORNIA

JUNE 30, 2025

1:16 P.M.

REPORTED BY:

LANA L. LOPER,

RMR, CRR, CCP, CME, CLR, CSR No. 9667

APPEARING REMOTELY FROM GRAYSON COUNTY, TEXAS

01:18:56

1 Q And you just took an oath to tell the truth.
2 That oath has the same force and effect as if you were
3 testifying in court in front of a judge and jury.

4 Do you understand that?

01:19:06

5 A Yes.

6 Q Okay. And so I'm going to ask you some
7 questions with regard to the La Palma police department.
8 So at some point, did you work for the La Palma police
9 department?

01:19:23

10 A Yes.

11 Q During what period of time?

12 A Um, from the summer of 2021 to the beginning of
13 January 2023.

14 Q And were you a police officer?

01:19:44

15 A Yes.

16 Q During that -- the entirety of your employment,
17 did you always have the same position, police officer?

18 A Yes.

19 Q Okay. And during your employment at La Palma
20 as a police officer, did you work with Ross Byer?

01:20:02

21 A Yes.

22 Q And was Ross Byer also a police officer in
23 La Palma?

24 A Yes.

01:20:13

25 Q How long did you two work together? An

01:20:17 1 approximate answer is fine, if you can give me an
2 approximation.

3 A Approximately, four months, I would say
4 approximately four months.

01:20:28 5 Q Okay. And is that four months that you two
6 were simultaneously employed by La Palma or was that
7 four months that you two worked together, like, on the
8 same shift?

9 A I would say, yeah, like, we were on the same
01:20:41 10 shift.

11 Q Okay. And do you recall, approximately, when
12 that was when you two were -- that four months when you
13 were on the same shift?

14 A Do I recall what, I'm sorry.

01:20:55 15 Q Approximately, what time period it was that you
16 and Ross Byer worked on the same shift together?

17 A In the year of 2022.

18 Q Okay. 2022. So would it have been later in
19 the year 2022.

01:21:08 20 A Yes, I would say so.

21 Q Okay. And when you two worked together on the
22 same shift, would you drive together in the same vehicle
23 or would you patrol different areas of the City of
24 La Palma in separate vehicles?

01:21:28 25 A We would drive different areas in different

01:28:36 1 MS. COHEN: Objection. I don't think he --
2 MR. PETRONELLI: If you know.
3 MS. COHEN: -- knew.
4 MR. PETRONELLI: I don't want you to guess.
01:28:42 5 THE WITNESS: I -- I -- I honestly don't
6 remember.
7 BY MR. PETRONELLI:
8 Q Okay. In your observation, in the time period
9 that you worked with Ross Byer, in your opinion, do you
01:28:56 10 think he was a good cop?
11 A I --
12 MS. COHEN: There's no foundation for his
13 opinion as to whether he knows someone is a good cop or
14 a bad cop, what his expertise is, but go ahead.
01:29:12 15 BY MR. PETRONELLI:
16 Q Let me -- let me ask it this way. Have you had
17 occasion to work with police officers over your career?
18 A Yes.
19 Q Okay. And you -- you're currently a police
01:29:22 20 officer, correct?
21 A Correct.
22 Q And after leaving La Palma, did you get
23 another -- another position with another department?
24 A Yes.
01:29:30 25 Q Okay. How many years total have you been a

01:29:33

1 police officer for?

2 A Approximately five years.

3 Q Okay. And in that five years, have you had
4 occasion to work with different police officers?

01:29:41

5 A Yes.

6 Q Okay. And in working with different police
7 officers, have you formed opinions about whether or not
8 certain police officers that you worked with are good at
9 their job and looked at other police officers and come
10 to the opinion that they're not good at their job?

01:29:54

11 A Yes.

12 Q In your opinion, did you have an opinion one
13 way or another about Ross Byer, whether he was, you
14 know, effectively performing his job as an officer for

01:30:09

15 La Palma?

16 A Yeah, he was.

17 MS. COHEN: Belated objection. Just lack of
18 foundation. Calls for an expert.

19 But you can answer.

01:30:18

20 THE WITNESS: Oh.

21 BY MR. PETRONELLI:

22 Q Yeah.

23 MS. COHEN: That's fine.

24 BY MR. PETRONELLI:

01:30:21

25 Q I think you said yes, he was. What is that --

01:30:23 1 what is that based on? Is that just based on the -- the
2 time period that you worked with him?

3 A Yes.

4 Q Okay. And so during that time period that you
01:30:36 5 worked with Ross, did an employee named Sgt. Won Koh
6 also work for La Palma?

7 A Yes.

8 Q What was his position at that time?

9 A He was a sergeant.

01:30:51 10 Q Okay. And did you -- did you work or report --
11 strike that.

12 Did you ever report to Sgt. Koh?

13 A What do you mean in terms of "report"?

14 Q Did you ever -- was he, like, ever the sergeant
01:31:13 15 on your shift?

16 A Yes.

17 Q Okay. And during what period of time?

18 A That month I -- or that -- that time I was with
19 Byer.

01:31:23 20 Q Oh, okay. And at some point in time -- well,
21 let me -- let me ask you this way: Did you have an
22 opinion -- strike that.

23 Did you enjoy your time during which you
24 reported to Sgt. Koh?

01:31:47 25 MS. COHEN: Objection to the notion of enjoy

01:31:49 1 one's time during employment as a police officer. If
2 that's a thing, but go ahead.

3 BY MR. PETRONELLI:

4 Q Did you like working -- did you like shifts
01:31:59 5 where you reported to Sgt. Koh?

6 A I mean, do I have to answer that? I mean,
7 it -- I just worked, like, I didn't go out of my way to
8 like it or not like it. I would say mostly, for the
9 most part, I -- I wouldn't have chosen him as my
01:32:17 10 supervisor.

11 Q Okay. Why do you say that?

12 A Because he was, I would say, retaliatory.

13 Q And why do you say that?

14 A If you disagree with something or if you
01:32:32 15 weren't -- didn't essentially have his style of police
16 work, then he would go out of his way to make sure you
17 were staying busy throughout the night.

18 Q Did you personally observe him do that?

19 A Yes.

01:32:54 20 Q To who?

21 A To me.

22 Q Okay. So is there a reason that -- so what do
23 you mean that he was going out of his way to make sure
24 that you were busy during the night? What would he do
01:33:05 25 specifically?

01:34:21 1 you know, made you believe he was -- he was assigning
2 those to you?

3 A I was sitting with another officer. It wasn't
4 Byer at the time -- sitting -- sitting with another
01:34:38 5 officer toward the end of shift in front of a 7-Eleven
6 parking lot just talking.

7 Q Okay. Okay. And did Koh find out that you
8 were like parked talking to this other officer?

9 A Well, he used to watch our GPSs.

01:34:55 10 Q Okay. And did he confront you about that?

11 A No, that's all he said. I walked by and he
12 said, oh, I'm going to go out and find something for you
13 guys.

14 Q And did he indicate it was because he had seen
01:35:05 15 you parked at the 7-Eleven, like, with the other
16 officer?

17 A I believe so because he -- well, he didn't
18 specifically say why, but there wasn't any radio traffic
19 for about, like, a couple of hours from there that I
01:35:16 20 remember, so...

21 Q And did you ever -- did you ever personally
22 make a complaint about Sgt. Koh to anyone at La Palma?

23 A Yes.

24 Q Who did you complain to?

01:35:32 25 A Capt. Wilkerson at the time.

01:35:34

1 Q Okay. And what -- what was the substance of
2 that complaint?

3 A I went into his office and then Capt. Amend at
4 the time came in as well. And as -- basically along the

01:35:44

5 lines, am I doing something wrong. Basically, am I
6 doing something wrong for this sergeant to go out of his
7 way and do those things.

8 Q Okay. And do you recall how they responded, if
9 at all?

01:35:57

10 A Basically, I need to learn to work with other
11 types of personalities.

12 Q Do you recall how long that meeting was?

13 A Maybe -- maybe 10 to 15 minutes.

14 Is it okay if I can drink some water real
01:36:20 15 quick?

16 Q Sure, absolutely.

17 And --

18 A Go ahead please, I'm sorry.

01:36:39

19 Q Sorry. Okay. Besides that -- so you
20 complained about Koh or brought up Koh assigning you
21 these stops to Capt. Amend and Capt. Wilkerson and kind
22 of inquired as to why you were getting those, and their
23 response was that you needed to learn to work with other
24 personalities like Sgt. Koh's; is that correct?

01:37:03

25 A Correct. Correct, I'm sorry.

01:37:05 1 Q After that, did you have any interactions with
2 Sgt. Koh about, you know, you bringing this to
3 Capt. Amend or Capt. Wilkerson?
4 A Yes.

01:37:20 5 Q What interactions did you have with Sgt. Koh?
6 A May I refer to my notes, please.
7 Q Sure. You have notes?
8 A Yeah.
9 Q Yes.

01:37:27 10 A Okay. Let me -- I don't know, it's probably
11 going to take me out of the picture, but I can read them
12 to you guys. Can you guys still hear me?
13 Q Yep.
14 A Let's see, so on 4/12/2022 at 0800 hours, this

01:37:54 15 is what I had written down, this is what I wrote down at
16 the time. Koh followed me outside to talk about the
17 incident that happened a few months ago involving him
18 finding work for us. He said he just found out about
19 my, quote-unquote, bitching and complaining from someone

01:38:08 20 other than Amend. He said how I needed to go to him
21 from now on when I have a problem instead of Amend. If
22 the problem were not to be solved, then I should go to
23 Amend; however, per his words, his behavior wouldn't
24 change.

01:38:21 25 Q And is that -- you said that was on 4/12/2022?

01:38:26 1 A Correct.

2 Q Okay. Was that -- what is that, is that like a
3 note you made in your phone at or around that time?

4 A Sorry. Hold on. Yes.

01:38:36 5 Q Okay. Why did -- why did you make that note?
6 Did you just -- were just documenting the
7 conversation --

8 A (Zoom freeze.)

9 Q -- at the time.

01:38:50 10 A Are you guys there?

11 Q Sorry, Zach, I think you froze.

12 A Are you guys there?

13 Q I just asked you why did you make that note in
14 your phone around the time you had that interaction with
01:38:59 15 Sgt. Koh?

16 A Just to report what was happening.

17 Q Okay. Did -- did you ever give that
18 information or show that note to anyone at La Palma?

19 A I -- I don't -- I don't want to say for sure,
01:39:14 20 but I -- I remember I -- how can I say this? I don't
21 want to say for sure, but I -- I may have brought it up
22 to HR, but I don't remember what -- if I did for sure.

23 Q Gotcha.

24 A I believe that I did.

01:39:27 25 Q Okay. So after this interaction with Sgt. Koh

01:39:33 1 where he -- did you say this took place in the parking
2 lot?
3 A Yes.
4 Q Was it in the -- was it in the -- were you,
01:39:38 5 like, leaving your shift or just getting to your shift?
6 A I was leaving. I think we were shooting that
7 day, like, for qualifications, and I was leaving the
8 parking lot to go home.
9 Q Okay. And then he, Sgt. Koh, followed you
01:39:55 10 outside and stopped you and had this interaction with
11 you?
12 A Correct.
13 Q Okay. Other than what you testified to and
14 that you had recorded in your phone, do you recall
01:40:05 15 anything else about that interaction?
16 A No, that -- that was it, from what I remember.
17 Q And how was his -- did he appear to be, like,
18 angry or upset when he was saying this to you?
19 A He was definitely upset.
01:40:21 20 Q Okay.
21 A Yeah.
22 Q And then at some point you said you may have
23 brought this interaction with Sgt. Koh up to HR, is
24 that -- did you have a separate time where you reported
01:40:31 25 Sgt. Koh to HR?

01:41:36

1 BY MR. PETRONELLI:

2 Q And is it fair to say you don't want to get
3 into the details of that?

4 A At this time because it's unrelated to

01:41:42

5 Sgt. Koh.

6 Q Gotcha. Okay. So then at some point you said
7 following this -- this complaint that you had raised
8 with HR, you said that your -- that your employment was
9 terminated?

01:41:59

10 A Following my complaint with HR, yes.

11 Q Okay. And do you recall how long -- how long
12 before your -- well, how long after you made this
13 complaint to HR that your employment was terminated?

14 A Approximately, two weeks.

01:42:21

15 Q Okay. And do you know who made the decision to
16 terminate your employment?

17 A Terry, Terry Kim was the chief at the time.

18 Q Okay. And you know, without getting into
19 the -- the details of the termination itself, do you --

01:42:52

20 do you believe that your -- your termination was
21 justified?

22 A Nope.

23 Q Why do you say that?

24 A Because what was put in my evaluation were lies

01:43:05

25 and that's what I -- sorry, I can't get too far into it,

01:43:09 1 but yeah, my evaluation with HR and shortly after I was
2 terminated.

3 Q Okay. And so you, without getting into the
4 details of it, you believe there was stuff in your
01:43:23 5 performance evaluation that was factually incorrect?
6 A Correct.

7 Q And then do you believe that that -- those
8 factual inaccuracies somehow related to you being
9 unfairly terminated?

01:43:38 10 A Correct.

11 Q And why do you think they're related? Do you
12 have some reason to believe it or is it just the timing
13 of when you went to HR and then the termination?

14 A Could you repeat the question again, I'm sorry.

01:43:48 15 Q Yeah. Is there -- is there a reason why you
16 think the termination is related to the inaccuracies in
17 your evaluation? Is there something that makes you
18 believe that or is it just the timing of when you went
19 to HR and then your termination came two weeks later?

01:44:05 20 A It was in regard -- I believe it was in -- I
21 believe I was terminated in regards to my complaint
22 against another sergeant, that's why.

23 Q Okay. And again, without getting into the
24 details of what was in the evaluation, who -- who
01:44:22 25 prepared your performance evaluation you believe had the

01:54:44

1

EXAMINATION

2

BY MR. PETRONELLI:

3

Q Do you -- do you believe that you going to HR

4

and disputing what you believe to be inaccuracies in

01:54:53

5

your evaluation was the reason you were terminated?

6

A Yes.

7

Q Do you think there's any other reason besides

8

that?

9

A No.

01:55:03

10

Q Okay. I don't have anything else.

11

MS. COHEN: Okay, that's fine. Me, too,

12

nothing.

13

THE VIDEOGRAPHER: Mr. Petronelli, you want a

14

standard video edit, correct?

01:55:13

15

MR. PETRONELLI: Yes. No, can I get it synched

16

with the transcript?

17

THE VIDEOGRAPHER: Text-to-video synch?

18

MR. PETRONELLI: Yes.

19

THE VIDEOGRAPHER: Okay. And then Ms. Cohen,

01:55:20

20

would you like a standard video?

21

MS. COHEN: No video. Don't need the video;

22

just the transcript.

23

THE VIDEOGRAPHER: Thank you.

24

THE REPORTER: On my record, who needs a copy

01:55:33

25

of the transcript and if you need a rough or expedite.

1 STATE OF CALIFORNIA)
2)
3 COUNTY OF SAN FRANCISCO)
4

5 I, Lana L. Loper, a Certified Shorthand
6 Reporter, do hereby certify:

7 That prior to being examined, the witness in
8 the foregoing proceedings was by me duly sworn to
9 testify to the truth, the whole truth, and nothing but
10 the truth;

11 That said proceedings were taken before me at
12 the time and place therein set forth and were taken down
13 by me in shorthand and thereafter transcribed into
14 typewriting under my direction and supervision;

15 I further certify that I am neither counsel
16 for, nor related to, any party to said proceedings, nor
17 in anywise interested in the outcome thereof.

18 In witness whereof, I have hereunto subscribed
19 my name.

20
21 Dated: July 10, 2025

22 
23

24 LANA L. LOPER, RMR, CRR, CCP, CME, CLR, CSR 9667
25